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 11 MAR 22 PM 3:07
 CLERK OF DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 LOS ANGELES

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

DR. FARZIN FEIZBAKHS, an
 individual doing business as DR.
 MICHAEL FEIZ,

Plaintiff,

vs.

SHAHRAM SALIMITARI, an
 individual; HOOMAN SHABATIAN,
 an individual; ADRIEN AIACHE, an
 individual; and DOES ONE through
 TEN, inclusive,

Defendants.

CV11-02413 JFW(PLA)

**COMPLAINT AND JURY
 DEMAND FOR:**

- (I) LANHAM ACT – § 43(a) (15 U.S.C. § 1125(a));
- (II) STATUTORY UNFAIR COMPETITION (CAL. BUS. & PROF. CODE § 17200 et seq.);
- (III) STATUTORY FALSE ADVERTISING (CAL. BUS. & PROF. CODE § 17500 et seq.).

Plaintiff DR. FARZIN FEIZBAKHS, doing business as Dr. Michael Feiz (“Dr. Feiz”), for his Complaint herein against SHAHRAM SALIMITARI (“Salimitari”), HOOMAN SHABATIAN (“Shabatian”), ADRIEN AIACHE (“Aiache”), and DOES ONE through TEN, inclusive (collectively, “Defendants”), alleges as follows:

NATURE OF THE ACTION

1. This is an action for: (i) false designation of origin, false or misleading description of fact, or false or misleading representation of fact in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); (ii) unfair competition in violation of

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1 Cal. Bus. & Prof. Code §§ 17200 *et seq.*; and (iii) false advertising in violation of Cal.
2 Bus. & Prof. Code §§ 17500 *et seq.*

3 **JURISDICTION AND VENUE**

4 2. This Court has jurisdiction pursuant to 15 U.S.C. § 1121(a) and 28 U.S.C.
5 §§ 1331 and 1338(a) in that this case arises under the laws of the United States pursuant
6 to the Lanham Act, 15 U.S.C. §§ 1051 *et seq.*

7 3. This Court has supplemental jurisdiction over the claims herein arising
8 under the laws of the State of California pursuant to 28 U.S.C. §§ 1338(b) and 1367 in
9 that said claims are so related to Plaintiff's federal claims that they form part of the
10 same case or controversy under Article III of the United States Constitution.

11 4. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) in that a
12 substantial part of the events or omissions giving rise to the claims herein occurred in
13 this judicial district.

14 **PARTIES**

15 5. Dr. Feiz is an individual residing in California with a principal place of
16 business at 435 N. Roxbury Drive, Suite 100, Beverly Hills, CA 90210. Dr. Feiz is
17 now, and for approximately eleven years has been, engaged in the business of providing
18 surgical services in the greater Los Angeles area under the trade name "Dr. Feiz."

19 6. Upon information and belief, Salimitari is an individual residing in
20 California with a principal place of business at 18425 Burbank Blvd., Suite 105,
21 Tarzana, CA 91356. Upon information and belief, Salimitari does business under the
22 name Lap-Band VIP, among other fictitious business names.

23 7. Upon information and belief, Shabatian is an individual residing in
24 California with a principal place of business at 18425 Burbank Blvd., Suite 105,
25 Tarzana, CA 91356. Upon information and belief, Shabatian does business under the
26 name Lap-Band VIP, among other fictitious business names.

27 8. Upon information and belief, Aiache is an individual residing in California
28 with a principal place of business at 9884 Santa Monica Blvd., Suite 102, Beverly Hills,

1 CA 90212. Upon information and belief, Aiache does business under the name Lap-
2 Band VIP, among other fictitious business names.

3 9. DOES 1 to 10 are presently unidentified entities who may be liable under
4 one or more of the claims in the matter complained of herein. Plaintiff does not know
5 the true names and capacities of the Defendants sued herein as Does One through Ten,
6 inclusive, and therefore sues these Defendants by fictitious names. Does One through
7 Ten conspired with Salimitari, Shabatian, and Aiache to unlawfully trade on Plaintiff's
8 trade names and associated goodwill. Plaintiff will amend this Complaint to allege the
9 true names and capacities of these Defendants when he ascertains the same.

10 INTRODUCTION

11 10. For the past six years, Plaintiff has engaged in the business of providing
12 gastric, bariatric and other laparoscopic surgical procedures in the greater Los Angeles
13 area under the trade name "Dr. Feiz." Dr. Feiz is recognized by his peers and the
14 consuming public as a pioneer in the field of Laparoscopic Adjustable Gastric Band and
15 Sleeve Gastrectomy surgeries (collectively, "Bariatric Surgeries"). Bariatric Surgeries
16 are among the most frequently performed types of weight loss surgery in the United
17 States, including the greater Los Angeles area. These surgical procedures utilize
18 medical implants – most notably the LAP BAND®, as well as stapled procedures to
19 help patients achieve and maintain a healthier weight by restricting meal portion sizes
20 and reducing hunger sensations.

21 11. As a result of his education, training, and years of dedicated service to his
22 patients, Dr. Feiz has developed a well-earned reputation as one of the most respected,
23 widely-recognized, and sought-after Bariatric Surgeons in Southern California. For at
24 least the past six years, Plaintiff has used the trade name "Dr. Feiz" to designate the
25 high quality Bariatric Surgery services he provides.

26 12. Dr. Feiz has been heard on numerous radio stations in the greater Los
27 Angeles area, including KHHT and KIIS, on the subject of Bariatric Surgery. Dr. Feiz
28 has been featured in Newsweek Magazine and on the Newsweek website as one of the

1 “Best Bariatric Surgeons in Los Angeles.” Dr. Feiz maintains a presence on YouTube,
2 Facebook, and various Internet blog sites dedicated to the discussion of Bariatric
3 Surgery issues of concern to consumers.

4 13. Dr. Feiz extensively advertises and promotes his services using the trade
5 name “Dr. Feiz” throughout the traditional and new media, including the Internet.
6 Since approximately 2006, Dr. Feiz has maintained a website at www.drfeiz.com that
7 he uses to attract potential consumers for his Bariatric Surgery services throughout
8 Southern California and the United States.

9 14. Over the past six years, Dr. Feiz has built a strong following in California
10 and other states and has become famous for his Bariatric Surgery services. As a result,
11 the “Dr. Feiz” trade name has acquired secondary meaning as the designation of source
12 or origin of the high quality and valuable Bariatric Surgery services that Dr. Feiz
13 provides.

14 15. More than two years ago, Dr. Feiz began to “bid” for the right to use
15 Google® Adwords® in his promotional activities. Google® Adwords® are special
16 search terms, *i.e.*, keyword triggers, that, when typed into the search field by a user of
17 the Google® Internet search engine, will cause the winning bidder’s paid advertisement
18 and website link to be displayed on the user’s computer screen in addition to, but in a
19 more prominent position than, the routine search results associated with those keyword
20 triggers.

21 16. Dr. Feiz has never sought to purchase the right to use his own trade name,
22 “Dr. Feiz,” as Google® Adwords®, but had he done so, he would have been able to
23 have his paid advertisement for his Bariatric Surgery services prominently featured on
24 the computer screen of any consumer who had used the Google® Internet search engine
25 to search the term “Dr. Feiz.”

26 17. To illustrate this form of advertising, a Google® search for the generic
27 term “golf clubs” triggers the prominent, *i.e.*, top-line, display of a paid advertisement
28 by Global Value Commerce, Inc., doing business as Global Golf. The ad consists of

1 the words: "Golf Clubs Super-Sale – Huge Selection of Name Brand Golf Clubs."

2 18. These advertising words are followed by an Internet link redirecting the
3 viewer to Global Golf's website. A true and correct copy of a screenshot of this
4 Google® Adwords® example is attached hereto as Exhibit A. As this example shows,
5 the winning bidder for any particular Google® Adwords® is in a position to redirect
6 enormous volumes of Internet traffic to its website based on an individual user's
7 personal interest in the search terms used, *i.e.*, the Google® Adwords® themselves.

8 19. Even though Dr. Feiz has never purchased the right to use the term "Dr.
9 Feiz" as Google® Adwords®, others who seek to trade on and profit unfairly from the
10 "Dr. Feiz" trade name have. Plaintiff is informed and believes that Defendants have
11 purchased the right from Google, Inc. to use "Dr. Feiz" as Google® Adwords® to
12 trigger the prominent, *i.e.*, top-line, placement of a paid advertisement for their
13 Bariatric Surgery services in the greater Los Angeles area.

14 20. Defendants operate a website on the Internet located at:
15 www.lapbandvip.com ("Defendants' Website") to advertise their Bariatric Surgery
16 services. Defendants' Website advertises for, and Defendants provide, Bariatric
17 Surgery services that are directly in competition with Dr. Feiz in the same marketplace.
18 In or about February 2011, Dr. Feiz discovered Defendants' use of the "Dr. Feiz" trade
19 name as Google® Adwords® in order to redirect potential customers away from
20 Plaintiff's website and to Defendants' Website.

21 21. Attached hereto as Exhibit B is a true and correct copy of a screenshot
22 reflecting the results of entering the term "Dr. Feiz" into the Google® Internet search
23 engine. As Exhibit B shows, a Google® search of the term "Dr. Feiz" results in the
24 top-line display of a paid advertisement that employs the following words: "LAP
25 BAND Surgery in SoCal – Highest Rated LAP BAND Surgeon! Before and after pics,
26 testimonials." These words are followed by the address for Defendants' Website at
27 www.lapbandvip.com/Weight-Loss-Surgery. Nowhere in this paid advertisement is
28 there a disclaimer informing consumers that Defendants and their website are not

1 associated with Dr. Feiz, or that Defendants are not a source or origin of the high
2 quality and valuable Bariatric Surgery services provided by Dr. Feiz.

3 22. As shown in Exhibit B, when consumers enter the term “Dr. Feiz” into the
4 Google® Internet search engine, they are presented with a paid advertisement that
5 accurately describes, and is consistent with the reputation of, Dr. Feiz, *i.e.*, “Lap Band
6 Surgery in SoCal – Highest Rated LAP BAND Surgeon!” Because this paid
7 advertisement accurately describes the reputation enjoyed by Dr. Feiz among the
8 consuming public, when consumers click on the link to Defendants’ Website contained
9 in this paid advertisement, they intend to be, and believe they will be, redirected to a
10 website at which they may pursue Bariatric Surgery services provided by Dr. Feiz.

11 23. Consumers, however, are not so redirected, but are redirected instead to
12 Defendants’ Website. Nowhere on Defendants’ Website, however, is there a disclaimer
13 informing consumers that Defendants and their website are not associated with Dr.
14 Feiz, or that Defendants are not a source or origin of the high quality and valuable
15 Bariatric Surgery services provided by Dr. Feiz.

16 24. Defendants’ use of the “Dr. Feiz” trade name in this manner creates the
17 false impression with consumers that Defendants are associated with Dr. Feiz in order
18 to induce their business or cause initial interest confusion. Upon information and
19 belief, Defendants are profiting from the use of the “Dr. Feiz” trade name as Google®
20 Adwords® by diverting customers away from Dr. Feiz and to themselves.

21 25. Attached hereto as Exhibits C, D, and E are true and correct copies of
22 screenshots reflecting the results of typing “Dr. Salimitari,” “Dr. Shabatian,” and “Dr.
23 Aiache,” respectively, into the Google® Internet search engine. As each of these
24 exhibits shows, there is no paid advertisement for Bariatric Surgery services that results
25 from the Google® Internet search of any of Defendants’ names. Defendants have not
26 purchased Google® Adwords® using their own names, but have elected instead to
27 unfairly trade on the much greater value and goodwill inherent in the “Dr. Feiz” trade
28 name to drive consumers to their website and away from Dr. Feiz’s website.

1 26. Defendants' failure to even use their own names as Google® Adwords®,
2 while deliberately using the "Dr. Feiz" trade name as Google® Adwords®,
3 demonstrates their bad faith, intent to confuse consumers as to the source and origin of
4 the Bariatric Surgery services provided by Dr. Feiz, and thus to profit at Plaintiff's
5 expense.

6 27. Dr. Feiz has devoted substantial time, effort, and resources in the
7 establishment of the goodwill, consumer recognition, and reputation of himself and his
8 trade names, including spending thousands of hours building and developing his name
9 in the greater Los Angeles community over the past eleven years.

10 28. Dr. Feiz has also expended significant resources to advertise his trade
11 names and services throughout Southern California and the United States in multiple
12 media including, but not limited to, Internet, television, radio, and print advertisements.

13 29. Dr. Feiz has not abandoned the use of his trade names to offer services,
14 and continues to use them to date.

15 **FIRST CLAIM**

16 **False Designation of Origin, False or Misleading Description of Fact, or False**
17 **or Misleading Representation of Fact Under 15 U.S.C. § 1125(a)**

18 30. Plaintiff re-alleges each and every allegation contained in paragraphs 1
19 through 29 as though set forth in full herein.

20 31. The acts of Defendants alleged herein constitute the use in interstate
21 commerce of a word, term, name, symbol, or device, or any combination thereof, and
22 false designation of origin, and a false or misleading description and representation of
23 fact, in connection with the sale, or offering for sale, of services in violation of section
24 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

25 32. The acts of Defendants are likely to cause consumers to be confused,
26 mistaken, or deceived into believing that Defendants are associated with Dr. Feiz,
27 and/or are the source or origin of the high quality and valuable Bariatric Surgery
28 services provided by Dr. Feiz, when they are not.

33. Defendants' acts entitle Plaintiff to his lost profits, as well as Defendants' profits derived from their past unlawful conduct, trebled, to the full extent provided under Section 35(a) of the Lanham Act, 15 U.S.C. § 1117(a).

34. Defendants' use of the "Dr. Feiz" trade name was willful, intentional, fraudulent, and done in bad faith, making this an exceptional case entitling Plaintiff to recover his attorneys' fees under Section 35(a) of the Lanham Act, 15 U.S.C. § 1117(a).

35. Plaintiff has no adequate remedy at law for the foregoing wrongful conduct. Plaintiff has been, and absent injunctive relief will continue to be, irreparably harmed by Defendants' actions.

SECOND CLAIM FOR RELIEF

Unfair Business Practices under California Business and Professions Code

§§ 17200 *et seq.*

36. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 35 as though set forth in full herein.

37. Defendants committed the acts alleged herein with the intent to cause consumers to be confused, mistaken, or deceived as to the source and origin of the Bariatric Surgery services displayed on Defendants' Website, and to palm off their Bariatric Surgery services as those of Plaintiff.

38. Defendants' acts entitle Plaintiff to general and special damages for all of Defendants' profits derived from their past unlawful conduct to the full extent provided for by Cal. Bus. & Prof. Code §§ 17200 *et seq.*

39. Defendants' use of the "Dr. Feiz" trade name was willful, intentional, fraudulent, and done in bad faith with the intent and design to injure Plaintiff's interests, and thus Plaintiff is entitled to punitive damages pursuant to Cal. Civ. Code. § 3294(c).

40. Plaintiff has no adequate remedy at law for the foregoing wrongful conduct. Plaintiff has been, and absent injunctive relief will continue to be, irreparably harmed by Defendants' actions.

THIRD CLAIM FOR RELIEF

False Advertising Pursuant to California Business and Professions Code

§§ 17500 *et seq.*

41. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 40 as though set forth in full herein.

42. By using the “Dr. Feiz” trade name as a keyword trigger to attract consumers to their advertisements, Defendants have falsely advertised Bariatric Surgery services in the United States, including California.

43. Defendants’ use of the “Dr. Feiz” trade name is a false designation of origin, and a false or misleading description and representation of fact, which is likely to cause consumers to be confused, mistaken, or deceived as to the origin, affiliation, sponsorship, or approval by or with Dr. Feiz of the Bariatric Surgery services advertised by Defendants on Defendants’ website.

44. Defendants’ acts entitle Plaintiff to general and special damages for all of Defendants’ profits derived from their past unlawful conduct to the full extent provided for by Cal. Bus. & Prof. Code §§ 17500 *et seq.*

45. Defendants’ use of the “Dr. Feiz” trade name was willful, intentional, fraudulent, and done in bad faith with the intent and design to injure Plaintiff’s interests, and thus Plaintiff is entitled to punitive damages pursuant to Cal. Civ. Code. § 3294(c).

46. Plaintiff has no adequate remedy at law for the foregoing wrongful conduct. Plaintiff has been, and absent injunctive relief will continue to be, irreparably harmed by Defendants’ actions.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

For a permanent injunction ordering Defendants, their agents, servants, employees, attorneys, and all persons in active concert or participation with Defendants

1 to refrain from using the "Dr. Feiz" trade name or any other mark or name identical to
 2 or substantially similar to the "Dr. Feiz" trade name, describing their services as being
 3 associated with Dr. Feiz or anything substantially similar thereto, or diluting or injuring
 4 the reputation of Dr. Feiz and/or the "Dr. Feiz" trade name;

5 For treble Defendants' profits and Plaintiff's lost profits in an amount to be
 6 determined in court, as well as costs and attorneys' fees pursuant to 15 U.S.C. 1117(b);

7 For general and special damages to the full extent provided for by Cal. Bus. &
 8 Prof. Code §§ 17200 *et seq.* and §§ 17500 *et seq.*

9 For punitive damages pursuant to Cal. Civ. Code. § 3294(c).

10 For such other and further relief as this Court deems just and proper.

11 **DEMAND FOR A JURY TRIAL**

12 Pursuant to F.R.C.P. 38(b), Plaintiff hereby demands a trial by jury in this action
 13 of any issues triable by jury.

14 DATED: March 21, 2011 Respectfully submitted,

15 THEODORA ORINGHER MILLER & RICHMAN PC

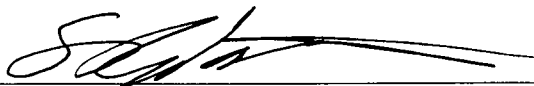
16
 17 By: 
 18 Samuel R. Watkins
 19 Attorneys for Plaintiff

EXHIBIT A

Web Images Videos Maps News Shopping Gmail more ▾

Sign in

Google

golf clubs

X

Search

Instant is on ▾

About 33,500,000 results (0.18 seconds)

Advanced search

Everything

Images

Videos

News

Shopping

Places

More

Los Angeles, CA

Change location

Any time

Latest

Past 24 hours

Past 2 days

Past week

Past month

Past year

Custom range...

All results

Sites with images

Wonder wheel

Related searches

More search tools

Something different

golf equipment

putters

racquets

golf bags

iron sets

► Golf Clubs Super Sale - Huge Selection Of Name Brand Golf Clubs.

Ad

Save Up To 70%

www.globalgolf.com

Cleveland HB3 Iron Set Used **Golf Clubs** **\$454.99**

Callaway X Junior Series 5-8 Years Old **\$199.99**

Club ...

Callaway X Girls Junior Series 5-8 Years **\$199.99**

Old ...

Related searches for **golf clubs**:

Brands: [PING](#) [TaylorMade](#) [Nike](#) [Callaway](#) [Cleveland](#)

Stores: [TGW](#) [Roger Dunn](#) [Rockbottom Golf](#) [Dick's Sporting Goods](#) [Golfsmith](#)

Types: [junior](#) [hybrid](#) [women's](#) [clone](#) [ladies](#)

TGW.com - The Golf Warehouse - The Premier Online Golf Superstore

TGW.com - The Golf Warehouse - **golf clubs**, drivers, irons, golf balls, golf bags, golf shoes, golf apparel, and golf equipment - Largest Selection of Golf ...

www.tgw.com/ - Similar

Worldwide Golf Shops - Golf Clubs, Golf Balls, Golf Accessories ...

Top Name Brand **Golf** Equipment at the Lowest Prices. Roger Dunn **Golf** Shops North Hollywood & Newbury Park Grand Openings · New Cleveland 2011 Products - In ...
www.worldwidegolfshops.com/ - Cached - Similar

Discount Golf Clubs | New Golf Clubs | Golf Equipment from ...

Largest selection of discount **golf clubs** and golf equipment with the lowest prices on golf gear anywhere.

Iron Sets - Drivers - Putters - Fairway Woods

www.rockbottomgolf.com/ - Cached - Similar

Places for **golf clubs** near Los Angeles, CA

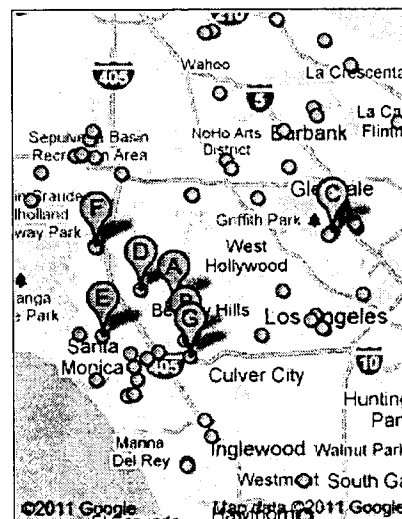
[Los Angeles Country Club](#) - 5 reviews - Place page
www.thelacc.org - 10101 Wilshire Boulevard, Los Angeles - (310) 276-6104

[Rancho Park Golf Course](#) - 59 reviews - Place page
maps.google.com - United States - (310) 838-7373

[Roosevelt Golf Course](#) - 20 reviews - Place page

rooseveltgolfclub.com - 2650 N. Vermont Ave, Los Angeles - (323) 665-2011

[Bel-Air Country Club](#) - 9 reviews - Place page
www.bel-aircc.org - 10768 Bellagio Road, Los Angeles - (310) 472-9563



Ads

TaylorMade Official Store

Shop TaylorMadeGolf.com & Get Free Shipping on Your Order Today!
taylormadegolf.com

Cheap TaylorMade Clubs

Buy TaylorMade **Clubs** at Close Out Prices at Hurricane Golf Today.
hurricanegolf.com is rated ★★★★★

www.hurricanegolf.com

Shop GolfClubs.com & Save

No CA Sales Tax - Save an Extra 9%!
And Every **Club** Ships Free Every Day
California
www.golfclubs.com

Affordable Golf Clubs

Want to Save Big On **Golf** Equipment?
We Got the Best Price on the Web
www.clickandsavegolf.com

Discount Golf Clubs

Save up to 70% in our Huge Sale!
Drivers - \$24.99, Putters - \$14.99
golfoutletsusa.com is rated ★★★★★

www.golfoutletsusa.com/golf-clubs

Callaway Golf Pre-Owned

Official Callaway Pre-Owned Site.
Low Prices and Money-Back Guarantee
This advertiser is rated ★★★★★

EXHIBIT B

Web Images Videos Maps News Shopping Gmail more ▾

Sign in

Google

dr. feiz

X

Search

Instant is on ▾

About 41,200,000 results (0.06 seconds)

Advanced search

Everything

Images

Videos

News

Shopping

Places

More

Los Angeles, CA

Change location

All results

Sites with images

More search tools

► LAP BAND Surgery in SoCal - Highest Rated LAP BAND Surgeon!

Before & After Pics, Testimonials

lapbandvip.com/Weight-Loss-Surgery

Lap Band Los Angeles | Lap Band Surgery California | Weight Loss ...

Lap Band Surgery California and Weight Loss Surgery California by Dr. Michael Feiz . If you are overweight and other Weight Loss Treatments haven't worked, ...

Our Team - Lap Band / Realize Band - Sleeve Gastrectomy - Weight Loss Surgery

www.drfeiz.com/ - Cached - Similar

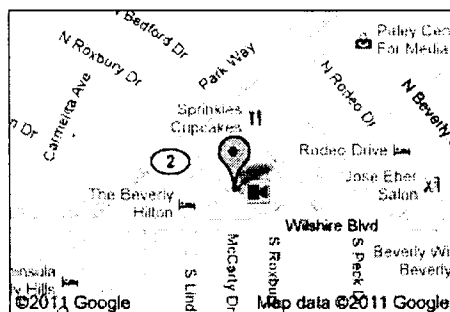
Ad

Ads

Dr. Feiz

View Credentials, Malpractice, Bio, Ratings, Reviews & Background Now!
www.lifescrpt.com/MD

See your ad here »



Lap Band Surgeon: Dr. Michael Feiz Place page

435 North Roxbury Drive, Suite 100

Beverly Hills, CA 90210


(310) 855-8058

Bus: Wilshire / Linden

Get directions - Is this accurate?

Open Weekdays 9am-5pm

★★★★★ 7 reviews

 Watch videos about our business Ads

Our Surgeons - Dr. Michael Feiz

Dr. Feiz received his Medical Degree from New York Medical College, with ...

www.drfeiz.com/our-surgeons.html - Cached

Body Incisions - Dr. Michael Feiz

"When doctor Feiz operates you are left with only 3 lentil size incision the ...

www.drfeiz.com/body-incisions.html - Cached

Show more results from drfeiz.com

Dr. Feiz LAP BAND Beverly Hills

★★★★★ 11 reviews

Sep 1, 2010 ... "I searched for months to find the right doctor for my lap band surgery. Since I was self pay I wanted to make sure that"

www.insiderpages.com/doctors/dr-feiz-lap-band-beverly-hills-beverly-hills - Cached

EXHIBIT C

Web Images Videos Maps News Shopping Gmail more ▾

Sign in

Google

Dr. Salimitari

X

Search

Instant is on ▾

About 2,630 results (0.15 seconds)

Advanced search

Everything

Images

Videos

News

Shopping

More

Los Angeles, CA

Change location

Show search tools

► **Dr. Shahram Salimitari, MD - General Surgery -**

Los Angeles, CA

Dr. Shahram Salimitari, MD, Los Angeles, CA, General Surgery. Get a FREE Background Report on **Dr. Salimitari**. View ratings, complaints, credentials, ...
www.healthgrades.com › Find a Physician › Search Results

Maps & Directions for Dr. Shahram Salimitari, MD - General Surgery ...

Maps and Directions for **Dr. Shahram Salimitari** - address, phone, fax and ...
www.healthgrades.com › Find a Physician › Search Results - Cached

Patient Ratings for Dr. Shahram Salimitari, MD - General Surgery ...

Patient Ratings for **Dr. Shahram Salimitari**, MD, Los Angeles, California, (CA ...
https://www.healthgrades.com/.../dr.../dr...salimitari.../patient-ratings - Cached

Show more results from healthgrades.com

Dr Shahram Salimitari

getLapBandNow.com Lap Band Surgen,If you are severely overweight and other programs have failed you,a qualified **DR SHAHRAM SALIMITARI LAP-BAND®** System ...
www.getlapbandnow.com/shahram.html - Cached - Similar

An AMAZING surgeon!!!! Dr. Salimitari rocks! - LAP-BAND® Surgery ...

Mar 11, 2011 ... I have absolutly NOTHING to gain by posting this. I do not work for any surgeon or have any other affiliation with his office.
www.lapbandtalk.com/.../126223-an-amazing-surgeon-dr-salimitari-rocks/ - Cached

LOS ANGELES HERNIA INSTITUTE

Dr. Shahram Salimitari. Minimally surgery specialist in obesity surgery and Lap-Band. **Dr. Salimitari** has performed thousands of operations and currently has ...
lahernia.com/ - Similar

Dr. Peyman Salimi-Tari, Internist - Doctor MD in Jacksonville, FL ...

1 review

Dr. Peyman Salimi-Tari, MD (Internist in Jacksonville, FL) - Quality Indicators, Special Expertise, Reviews and more on **Doctor Salimi-Tari**.
www.vitals.com › Doctors A to Z › S - Cached

Minimally Invasive Surgical Centers | Bariatric Weight Loss Surgery

Dr. Salimitari undertook his General Surgery residency at Mount Sinai Hospital in Chicago and continued his training with a fellowship in minimally invasive ...
yourlapband.com/minimally-invasive-surgical-centers - Cached - Similar

EXHIBIT D

Web Images Videos Maps News Shopping Gmail more ▾

Sign in

Google

Dr. Shabatian

×

Search

Instant is on ▾

About 25,500 results (0.19 seconds)

Advanced search

Everything

Images

Videos

News

Shopping

More

Los Angeles, CA

Change location

Show search tools

► **Dr. Babak Shabatian, MD - Ophthalmology - Los Angeles, CA**

Dr. Babak Shabatian, MD, Los Angeles, CA, Ophthalmology. Get a FREE Background Report on **Dr. Shabatian**. View ratings, complaints, credentials, and detailed ...
www.healthgrades.com › Find a Physician › Search Results

Malpractice & Sanctions Information for Dr. Babak Shabatian ...

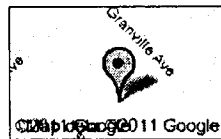
Background information for **Dr. Babak Shabatian** - malpractice, medical ...
www.healthgrades.com › Find a Physician › Search Results
Show more results from healthgrades.com

Dr. Hooman Shabatian, LAP-BAND | Bariatric Weight Loss Surgery ...

★★★★ 5 reviews
Dr. Hooman Shabatian, MD, Rated 3.0 Stars by Patients, Affiliated with 4 Star Hospital, Quality Indicators and more on **Dr. Shabatian**.
Show map of 19015 Town Center Dr, Apple Valley, CA 92308
www.vitals.com › ... › Surgical Specialists › CA › Apple Valley
- Cached - Similar

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► **Aiache Adrien E Md - Tarzana, CA, 91356 -**

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Jul 21, 2009 ... In addition to "Plastic surgery" **Dr. Aiache** is an expert on reconstructive surgery. I have the full use of my left hand, Thanks to Dr. ...

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Dr. Adrien Aiache

Dr. Aiache is dedicated to the best that plastic surgery can offer the patient who chooses a cosmetic enhancement. He is world renown for body implants and ...

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Plastic Surgeon Dr. Adrien Aiache offers the latest in plastic surgery ...

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Beverly Hills, CA

Dr. Adrien Aiache, MD, Beverly Hills, CA, Plastic Surgery.

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Beverly Hills Plastic Surgeon Dr. Aiache - Breast

Augmentation ...

Dr. Aiache, a Board-Certified Plastic/Reconstructive Surgeon (at one time on staff at 18 different hospitals) has racked up some 30 years experience ...

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Dr. Adrien Aiache graduated from the Paul Sabatier Medical School in Toulouse ... **Dr Aiache** has become world

renowned as a plastic surgeon, an instructor on ...

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Plastic Surgeon Beverly Hills, Plastic Surgeons in
Los Angeles ...

Dr Adrien Aiache, Plastic Surgeon in Los Angeles, Cosmetic Surgeon in Beverly ... COM All Web site content (c) 2008 **Dr. Adrien Aiache** and Internet Medical ...

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge John F. Walter and the assigned discovery Magistrate Judge is Paul Abrams.

The case number on all documents filed with the Court should read as follows:

CV11- 2413 JFW (PLAx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

[X] Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

DR. FARZIN FEIZBAKHS, an individual doing
business as DR. MICHAEL FEIZ,

Plaintiff

v.
SHAHRAM SALIMITARI, an individual; HOOMAN SHABATIAN,
an individual; ADRIEN AIACHE, an individual; and DOES ONE
through TEN, inclusive,

Defendant

Civil Action No.

CV11-02413 JFW (PLA)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Shahram Salimitari, 11701 Texas Avenue, #311, Los Angeles, CA 90025
Hooman Shabatian, 11911 Mayfield Ave, Los Angeles, CA 90049
Adrien Aiache, 713 N Elm Drive, Beverly Hills, CA 90210-3422

A lawsuit has been filed against you.


Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Samuel R. Watkins, Esq.
THEODORA ORINGER MILLER & RICHMAN PC
10880 Wilshire Boulevard, Suite 1700
Los Angeles, California 90024-4101
Telephone: (310) 557-2009

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 03/22/2011


Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Central District of California

DR. FARZIN FEIZBAKSH, an individual doing
business as DR. MICHAEL FEIZ,

Plaintiff

v.
SHAHRAM SALIMITARI, an individual; HOOMAN SHABATIAN,
an individual; ADRIEN AIACHE, an individual; and DOES ONE
through TEN, inclusive,

Defendant

Civil Action No.

CV 11-02413 JFW (PLAx)

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Hooman Shabatian, 11911 Mayfield Ave, Los Angeles, CA 90049
Adrien Aiache, 713 N Elm Drive, Beverly Hills, CA 90210-3422

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Samuel R. Watkins, Esq.
THEODORA ORINGHER MILLER & RICHMAN PC
10880 Wilshire Boulevard, Suite 1700
Los Angeles, California 90024-4101
Telephone: (310) 557-2009

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

JULIE PRADO

SEAL

Date: 03/22/2011

Signature of Clerk or Deputy Clerk

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> DR. FARZIN FEIZBAKSH, an individual doing business as DR. MICHAEL FEIZ,	DEFENDANTS SHAHRAM SALIMITARI, an individual; HOOMAN SHABATIAN, an individual; ADRIEN AIACHE, an individual; and DOES ONE through TEN, inclusive,
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Samuel R. Watkins, THEODORA ORJNGHER MILLER & RICHMAN PC, 10880 Wilshire Boulevard, Suite 1700, Los Angeles, CA, Telephone: (310) 557-2009	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
---	---	--	---	---	--	---

V. REQUESTED IN COMPLAINT: **JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$** To be proved at trial.

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 False designation of origin and misleading representation of fact under federal Lanham Act, 15 U.S.C. Section 1125(a).

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV11-02413

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
DR. FARZIN FEIZBAKHS, Los Angeles County	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
SHAHRAM SALIMITARI, Los Angeles County HOOMAN SHABATIAN, Los Angeles County ADRIEN AIACHE, Los Angeles County	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):

Date

MARCH 21, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))